Application No.:

10/781,341

Filing Date:

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REMARKS

Claims 1-10, 13-21, and 24 are pending. Claims 11, 12, 22, and 23 have been canceled without prejudice or disclaimer. The Applicants respond below to the objections and rejections.

Objections to the Specification

The Examiner objected to the title and to the abstract. Both have been amended. The Applicants request that the Examiner withdraw the objections.

Objection to Claims 1-23

The Examiner objected to Claims 1-23 for their use of the phrase "adapted for." All instances of "adapted for" have been removed or the relevant claims canceled. As such, the objection is most and the Applicants request its withdrawal.

<u>Indefiniteness Rejections</u>

The Examiner rejected Claims 1-15 and 17-24 as allegedly being indefinite. With respect to Claim 10, the Applicants do not agree that the term "recognized" is a relative term that renders the claim indefinite. In the context of Claim 10, the phrase "recognized connection" indicates a connection that is recognized by the claimed storage networking device. Claim 9 sets forth data maintained by the storage networking device that allows the storage networking device to determine whether a connection is a "recognized connection." Specifically, Claim 9 specifies that the storage networking device comprises "a connection lookup table defining a plurality of connections between the storage networking device and one or more remote storage networking devices, wherein the locational data is further configured to identify one of the connections in the connection lookup table." Accordingly, the Applicants request that the Examiner withdraw the indefiniteness rejection of Claim 10.

With respect to the other indefiniteness rejections, the Applicants do not agree that the claims are indefinite. Nevertheless, the Applicants have amended relevant portions of the claims in order to expedite prosecution because such amendments can be done without changing the scope of the claims.

The Applicants removed the phrase "capable of" from Claim 1. The Applicants submit that this amendment does not change the scope of the claims.

The Applicants removed the phrase "at least partially controlling" from Claim 1. The Applicants submit that this amendment does not change the scope of the claims.

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The Applicants removed the phrase "can be" from Claim 6. The Applicants submit that this amendment does not change the scope of the claims.

The Applicants removed the limitation including the term "substantially" from Claims 17 and 24. As a result of removing the entire limitation, the second locational data is not required to be substantially similar to the first locational data. Accordingly, this amendment broadens the scope of Claims 17-24.

As the above amendments render the indefiniteness rejections moot, the Applicants request that the Examiner withdraw these rejections.

Anticipation Rejections

The Examiner rejected Claims 1-24 as allegedly anticipated under 35 U.S.C. § 102(e) by United States Patent Application Publication No. 2004/0073622 to McDaniel *et al*. The Applicants traverse the rejections because the McDaniel publication does not teach every limitation of the amended claims.

Specifically, amended Claims 1, 16, and 24 are drawn to embodiments of the invention in which locational data for specifying a location within buffer memory is encoded within the Target Transfer Tag that is a part of the protocol data unit of the iSCSI protocol. Claim 1 recites "wherein the buffer locational data is encoded using a Target Transfer Tag of the iSCSI protocol data unit." Claim 16 recites "wherein the first locational data . . . is encoded using a Target Transfer Tag of the iSCSI protocol data unit." Claim 24 recites "a first locational data encoded within a Target Transfer Tag of the iSCSI protocol data unit."

The encoding of locational data within the Target Transfer Tag of the iSCSI protocol data unit is advantageous because no layers or mechanisms outside of the iSCSI protocol are required to implement direct memory access for data transfers that employ the iSCSI protocol. Rather, the Target Transfer Tag is a standard part of the iSCSI protocol data unit. Accordingly, in accordance with the embodiments of amended Claims 1, 16, and 24, direct memory access is provided for iSCSI data transfers without departing from the standard iSCSI protocol.

In view of the foregoing, the Applicants submit that the McDaniel publication does not teach every limitation of Claims 1, 16, and 24, and requests the allowance of these claims. The dependent claims are also allowable because they incorporate the limitations of Claims 1 or 16.

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In addition, the Applicants submit that the dependent claims are allowable based on their added limitations. As such, the Applicants request the allowance of the dependent claims.

The encoding of locational data within the Target Transfer Tag is an advantageous feature of embodiments of the invention but is not a required feature of the invention. Accordingly, the inclusion of this feature in Claims 1, 16, and 24 is not, and should not be interpreted as, a general disclaimer of devices that encode locational data in some other way. The inclusion of this or any other feature in Claims 1, 16, and 24 does not limit, and should not be interpreted to limit, other claims that may later be presented in this application or in a continuing application. The Applicants reserve the right to pursue claims of different and/or broader scope.

No Disclaimers or Disavowals

Although the present communication may include alterations to the application or claims, or characterizations of claim scope or referenced art, the Applicants are not conceding in this application that previously pending claims are not patentable over the cited references. Rather, any alterations or characterizations are being made to facilitate expeditious prosecution of this application. The Applicants reserve the right to pursue at a later date any previously pending or other broader or narrower claims that capture any subject matter supported by the present disclosure, including subject matter found to be specifically disclaimed herein or by any prior prosecution. Accordingly, reviewers of this or any parent, child or related prosecution history shall not reasonably infer that the Applicants have made any disclaimers or disavowals of any subject matter supported by the present application.

Please charge any additional fees, including any fees for additional extension of time, or credit overpayment to Deposit Account No. 11-1410.

Respectfully submitted,

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